

Before the  
**FEDERAL COMMUNICATIONS COMMISSION** RECEIVED  
 Washington, D.C. 20554

MAY - 9 2003

In the Matter of

Amendment of Section 73.202(b)  
 Table of Allotments,  
 FM Broadcast Stations  
 (LaGrange, Greenville and  
 Waverly Hall, Georgia)

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FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

MB Docket No. \_\_\_\_\_

RM-\_\_\_\_\_

To: Assistant Chief, Audio Division  
 Media Bureau

**JOINT PETITION FOR RULE MAKING  
 OF COX RADIO, INC., CXR HOLDINGS, INC.  
 AND DAVIS BROADCASTING INC., OF COLUMBUS**

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May 9, 2003

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## SUMMARY

By this Petition for Rule Making (“Petition”), Cox Radio, Inc., its wholly-owned subsidiary CXR Holdings, Inc. (collectively “Cox”), and Davis Broadcasting Inc., of Columbus (“Davis Broadcasting”) propose a set of allotments that would provide first local service to the community of Waverly Hall, Georgia. Cox and Davis Broadcasting (collectively “the Parties”) propose to delete Channel 239C3 at Greenville, Georgia, and allot Channel 239A to Waverly Hall, Georgia, for use by WKZJ(FM) as Waverly Hall’s first local service. To replace the local service being vacated in Greenville by WKZJ(FM), the Parties propose to reallocate Channel 281C1 from LaGrange, Georgia, to Greenville, Georgia, for use by WALR-FM. Thus, the Parties’ proposal would provide first local service to Waverly Hall, maintain local service in LaGrange and Greenville, and provide a higher class channel for Greenville. Adoption of the Parties’ proposal would achieve a preferential arrangement of allotments under the Commission’s allotment priorities. Accordingly, the Parties respectfully request that the Commission institute a rulemaking to amend Section 73.202(b), the FM Table of Allotments, as proposed herein.

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To: Assistant Chief, Audio Division  
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**JOINT PETITION FOR RULE MAKING  
OF COX RADIO, INC., CXR HOLDINGS, INC.  
AND DAVIS BROADCASTING INC., OF COLUMBUS**

Cox Radio, Inc., its wholly-owned subsidiary CXR Holdings, Inc. (collectively "Cox"), and Davis Broadcasting Inc., of Columbus ("Davis Broadcasting"), by their attorneys and pursuant to Section 1.420(i) of the Commission's Rules,<sup>1</sup> hereby respectfully submit this Petition for Rule Making ("Petition") requesting that the Commission institute a rulemaking to amend Section 73.202(b), the FM Table of Allotments, as proposed herein. By this Petition, Cox and Davis Broadcasting (collectively "the Parties") propose a set of allotments that would provide first local service to one community and provide a higher class channel for another community.

Specifically, the Parties propose to delete Channel 239C3 at Greenville, Georgia, and allot Channel 239A to Waverly Hall, Georgia, for use by WKZJ(FM) as Waverly Hall's first local service.<sup>2</sup> To replace the local service being vacated in Greenville by WKZJ(FM), the

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<sup>1</sup> 47 C.F.R. § 1.420(i).

<sup>2</sup> Davis Broadcasting is the licensee of WKZJ(FM), Greenville, Georgia.

Parties propose to reallocate Channel 281C1 from LaGrange, Georgia, to Greenville, Georgia, for use by WALR-FM.<sup>3</sup>

As demonstrated herein, the proposed reallocations would achieve a preferential arrangement of allocations under the Commission's allocation priorities and would further the public interest.<sup>4</sup> Grant of the Petition would provide first local service to the community of Waverly Hall and maintain local service in Greenville and LaGrange. Moreover, the proposal would provide Greenville with a Class C1 rather than a Class C3 station. This would create a "net" gain in service to 41,600 persons with a net service area loss of 2,300 square kilometers.<sup>5</sup>

#### **I. PROPOSED ALLOTMENT OF CHANNEL 239A TO WAVERLY HALL, GEORGIA.**

The Parties propose to delete Channel 239C3 at Greenville, Georgia, and allocate Channel 239A to Waverly Hall, Georgia, as Waverly Hall's first local service and modify the license of WKZJ(FM) accordingly (the "Waverly Hall Proposal").<sup>6</sup> The Waverly Hall Proposal squarely meets the Commission's criteria for grant of a proposed amendment to the FM Table of Allotments. In *Modification of FM and TV Authorizations to Specify a New Community of License*, the Commission stated that it would approve petitions for rule making requesting a change in a station's community of license without affording other interested parties an opportunity to file competing expressions of interest if (i) the proposed channel is mutually exclusive with the existing channel and (ii) the proposed allocation plan would result in a

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<sup>3</sup> CXR Holdings, Inc. is the licensee of WALR-FM, LaGrange, Georgia.

<sup>4</sup> See Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, *Report and Order*, 4 FCC Rcd 4870, ¶ 25 (1989) ("Community of License R&O"), *recon. granted in part*, 5 FCC Rcd 7094 (1990) ("Community of License MO&O"); Revision of FM Assignment Policies and Procedures, *Second Report and Order*, 90 FCC 2d 88, ¶ 7 (1982). These priorities are (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters. The second and third priorities are given equal weight by the Commission.

<sup>5</sup> See Exhibit A (Technical Exhibit by du Treil, Lundin & Rackley, Inc. ("Technical Exhibit")).

<sup>6</sup> See Technical Exhibit.

preferential arrangement of allotments under the Commission's allotment priorities.<sup>7</sup> To determine whether a proposal would result in a preferential arrangement of allotments, the Commission compares the proposed allotment plan and the existing state of allotments for the communities involved based on the FM allotment priorities.

The Waverly Hall Proposal satisfies the Commission's requirements. The proposed allotment of Channel 239A at Waverly Hall is mutually exclusive with WKZJ(FM)'s present assignment of Channel 239C3 at Greenville, Georgia,<sup>8</sup> and the Waverly Hall Proposal would achieve a preferential arrangement of allotments by providing first local service to Waverly Hall. As explained below, Greenville would maintain local service pursuant to the reallocation of Channel 281C1 from LaGrange, Georgia to Greenville for use by WALR-FM (the "Greenville Proposal").

Upon the Commission's grant of the proposal, Davis Broadcasting will timely file an application to operate WKZJ(FM) on Channel 239A at Waverly Hall and implement the necessary changes in accordance with the FCC's rules.

**A. Technical Compliance.**

The Waverly Hall Proposal complies with the Commission's technical requirements.<sup>9</sup> Operation of WKZJ(FM) on Channel 239A from the proposed reference site would provide the requisite city grade coverage to Waverly Hall and would comply with the minimum distance separation requirements.

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<sup>7</sup> *Community of License R&O*, 4 FCC Rcd 4870, ¶ 25 ("[W]e will compare the proposed allotment plan to the existing state of allotments for the communities involved. If adoption of the proposed allotment plan would result in a net service benefit for the communities involved (that is, if the plan would result in a preferential arrangement of allotments), we will adopt the proposal."). *See also* 47 C.F.R. § 1.420(i).

<sup>8</sup> *See* Technical Exhibit.

<sup>9</sup> *See id.*

The Waverly Hall Proposal would result in a service gain over an area of 1,100 square kilometers containing 128,000 persons and would result in a loss over an area of 3,400 square kilometers containing 86,400 persons.<sup>10</sup> All of the loss area would have five or more aural services remaining<sup>11</sup> and thus is considered well-served. As proposed, the Channel 239A 60 dBu service area would serve 157,000 persons over an area of 2,460 square kilometers as compared to the existing Channel 239C3 60 dBu service area containing 115,500 persons over an area of 4,780 square kilometers.<sup>12</sup> No aural services are assigned to Waverly Hall,<sup>13</sup> and grant of the Petition would provide Waverly Hall with its first local aural service with no net loss in services assigned to Greenville.

**B. Waverly Hall Is a Community For Allotment Purposes.**

Waverly Hall, Georgia qualifies as a community and merits a first local aural service preference. Waverly Hall is an incorporated town,<sup>14</sup> listed in the U.S. Census,<sup>15</sup> and thus meets the basic criteria for a community.<sup>16</sup> Waverly Hall is not located within any census-defined urbanized area, and the proposed allotment would not encompass more than 50% of an urbanized

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<sup>10</sup> *See id.*

<sup>11</sup> *See id.*

<sup>12</sup> *See id.*

<sup>13</sup> *See id.*

<sup>14</sup> *See 2000 Rand McNally Commercial Atlas and Marketing Guide.*

<sup>15</sup> *See Exhibit B (U.S. Census Bureau at <<http://www.census.gov>>).*

<sup>16</sup> *See, e.g., Pontotoc, Tennessee*, 11 FCC Rcd 14430, ¶ 15 (1996) (stating that the proposed community's incorporation and listing in the Census meet the Commission's basic criteria for a community); *Brookline, Missouri*, 10 FCC Rcd 13038, ¶ 4 (1995) ("While 'incorporation is not a prerequisite [for community status], and while a community need not have a clearly delineated area and population, it is no doubt correct to state that in most cases a community is a city, town, village, or other political subdivision"); *Naples, Florida*, 41 RR 2d 1549, ¶ 11 (1977) (stating that the question of community status is "easily answered" "[i]f it is an incorporated community").

area.<sup>17</sup> Accordingly, a *Huntington/Tuck* analysis demonstrating that Waverly Hall is independent of an urbanized area is not required.<sup>18</sup>

Waverly Hall, founded in 1827, is a “tightly knit community that has many long time residents.”<sup>19</sup> Waverly Hall is an incorporated town with a population of 709 persons.<sup>20</sup> Waverly Hall has its own local government, which is headed by elected Mayor Timothy B. Reeves and a part-time five-member city council.<sup>21</sup> Waverly Hall has a fire department, which is staffed by ten volunteers, and a police department, which has two full time officers.<sup>22</sup>

Waverly Hall has its own post office<sup>23</sup> and its own zip code (31831).<sup>24</sup> Waverly Hall also has its own phone book through the independent telephone company Waverly Hall Telephone, LLC.<sup>25</sup> Waverly Hall has its own grocery stores,<sup>26</sup> restaurants,<sup>27</sup> and a bank,<sup>28</sup> as well as businesses using the name “Waverly Hall” such as Waverly Hall Motor Co., Inc. and Waverly Hall Farm and Tractor.<sup>29</sup> Waverly Hall also has nine churches<sup>30</sup> and a local chapter of the POW-

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<sup>17</sup> See Technical Exhibit.

<sup>18</sup> See *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) (“*Tuck*”); *Huntington Broadcasting Co., v. FCC*, 192 F.2d 33 (D.C. Cir. 1951). See, e.g., *Headland, Alabama, and Chattahoochee, Florida*, 10 FCC Rcd 10352, ¶ 11 (1995) (Applying *Tuck*, the staff “requires stations that have sought to reallocate their channels and to modify their licenses from rural communities to suburban communities within Urbanized Areas (as recognized by the U.S. Census) to make a showing that the suburban community warrants a first local service preference”).

<sup>19</sup> See Exhibit B (Harris County Online Guide at <<http://www.harriscounty.com/communities/waverlyhall.htm>>).

<sup>20</sup> See Exhibit B (U.S. Census Bureau at <<http://www.census.gov>>).

<sup>21</sup> Conversation with Waverly Hall City Clerk on January 27, 2003.

<sup>22</sup> *Id.*

<sup>23</sup> See Exhibit B (Post Office Locator <<http://www.usps.gov>>).

<sup>24</sup> See Exhibit B (City State / ZIP Code Associations at <<http://www.usps.gov>>).

<sup>25</sup> Conversation with L. Whitley of Waverly Hall Telephone, LLC on April 14, 2003.

<sup>26</sup> See Exhibit B (Addresses for Waverly Hall Churches, Businesses and Associations).

<sup>27</sup> See *id.*

<sup>28</sup> See *id.*

<sup>29</sup> See *id.*

<sup>30</sup> See *id.*



MIA veterans organization “Rolling Thunder,”<sup>31</sup> as well as a prominent local private school, Waverly Hall Christian Academy.<sup>32</sup>

Waverly Hall merits community status for FCC allotment purposes. Upon the Commission’s grant of the proposal, Davis Broadcasting will timely file an application to operate WKZJ(FM) on Channel 239A at Waverly Hall and implement the necessary changes in accordance with the FCC’s rules. A grant of the proposal would provide first local aural service to the residents of Waverly Hall while maintaining local service at Greenville and thus achieve a preferential arrangement of allotments.

## **II. PROPOSED REALLOTMENT OF CHANNEL 281C1 TO GREENVILLE, GEORGIA.**

To replace the first local service at Greenville, Georgia currently provided by Channel 239C3, Cox proposes to delete Channel 281C1 from LaGrange, Georgia, and allot Channel 281C1 to Greenville, Georgia, for use by WALR-FM (the “Greenville Proposal”). As required by the Commission’s rules, the proposed allotment of Channel 281C1 at Greenville is mutually exclusive with WALR-FM’s present assignment of Channel 281C1 at LaGrange, Georgia<sup>33</sup> and would achieve a preferential arrangement of allotments. The reallocation of Channel 281C1 to Greenville would replace Greenville’s local service and the station’s current city of license, LaGrange, would remain served by WLAG(AM), WTRP(AM) and WOAK(FM), a non-commercial FM station.

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<sup>31</sup> *See id.*

<sup>32</sup> *See id.* (Waverly Hall Christian Academy at <<http://www.whchristian.org>>).

<sup>33</sup> *See* Technical Exhibit.

Upon the Commission's grant of the proposal, Cox will timely file an application to operate WALR-FM on Channel 281C1 at Greenville, and implement the necessary changes in accordance with the FCC's rules.

**A. Technical Compliance.**

The Greenville Proposal complies with the Commission's technical requirements.<sup>34</sup> The channel substitution will be made at the existing transmitter site location for WALR-FM and as a result, no gain or loss areas will be created.<sup>35</sup> Operation from the proposed site would provide the requisite city grade coverage to Greenville and would comply with the minimum distance separation requirements.<sup>36</sup> The Channel 281C1 60 dBu service area would maintain service to 2,485,000 persons in an area of 16,280 square kilometers with no resulting gains or losses of service.<sup>37</sup>

**B. Greenville Is a Community for Allotment Purposes.**

Because Greenville already has a local service, the Commission has previously determined that Greenville merits its own local radio service.<sup>38</sup> Greenville is not located within any census-defined urbanized area, and WALR-FM currently covers less than 50% of the Atlanta urbanized area and would continue to do so when the community of license is changed to Greenville.<sup>39</sup> As discussed above, the Commission does not require a *Huntington/Tuck* analysis in these circumstances.

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<sup>34</sup> See *id.*

<sup>35</sup> See *id.*

<sup>36</sup> See *id.*

<sup>37</sup> See *id.*

<sup>38</sup> See *Greenville and LaGrange, Georgia*, 5 FCC Rcd 5799 (1990) (allocating Channel 239A to Greenville, Georgia for first local service).

<sup>39</sup> See Technical Exhibit.

### III. CONCLUSION

The Petition presents a set of allotments that would achieve a preferential arrangement of allotments as compared with the current allotment scheme. The Commission has stated, “If adoption of the proposed allotment plan would result in a net service benefit for the communities involved (that is, if the plan would result in a preferential arrangement of allotments), we will adopt the proposal.”<sup>40</sup>

Grant of the Petition would provide Waverly Hall with a first local service, provide Greenville with a replacement local service, and leave LaGrange with at least one remaining local service. Moreover, the Petition would replace a Class C3 station with a superior Class C1 station in Greenville and provide a “net” gain in service to 41,600 persons. In contrast, the existing set of allotments only provides local service to Greenville, provides LaGrange with more than one local service and does not provide a local service to Waverly Hall. Grant of the Petition would result in a “net gain” of first local service to one community without loss of local service to any of the other communities involved. Accordingly, examination of the Petition according to the FM allotment priorities and resulting public interest benefits clearly weighs in favor of granting the Petition.

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<sup>40</sup> *Community of License R&O*, 4 FCC Rcd 4870, ¶ 25.

#### IV. SUMMARY OF PROPOSED AMENDMENTS TO TABLE OF ALLOTMENTS

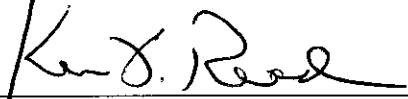
In light of the foregoing, the Commission should issue a *Notice of Proposed Rule Making* proposing to implement the following amendments to the FM Table of Allotments:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Greenville, GA	239C3	281C1
La Grange, GA	281C1	---
Waverly Hall, GA	---	239A

Respectfully submitted,

COX RADIO, INC.  
CXR HOLDINGS, INC.

By:



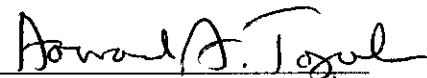
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May 9, 2003

**EXHIBIT A**

Technical Exhibit of duTreil, Lundin & Rackley, P.C.

TECHNICAL EXHIBIT  
PETITION FOR RULE MAKING

Table of Contents

Figure 1	Summary of Gain/Loss Analysis
Figure 2	Channel 239A Waverly Hall Allocation
Figure 3	Channel 281C1 Greenville Allocation

TECHNICAL EXHIBIT  
PETITION FOR RULE MAKING

Technical Narrative

This Technical Exhibit, of which this Narrative is part, proposes an FM Rule Making to modify the Commission's Table of Allotments contained within Section 73.202 of the Commission's Rules. This proposal would have a "net" service population gain of 41,600 persons and a "net" service area loss of 2,300 square kilometers.

All population data, unless otherwise noted, is based upon the 2000 Housing and Population Census. The determination of available reception services was based on the criteria set forth in footnote 1 of the Notice of Proposed Rule Making in MM Docket No. 96-219 (DA 96-1774; adopted October 25, 1996, released November 1, 1996). Urbanized area definitions are based upon the 2000 Census.

Summary of Rule Making Proposal

Below is a summary of the allocation changes requested in the Rule Making.

- Delete Channel 239C3 at Greenville, Georgia and allot Channel 239A to Waverly Hall, Georgia.
- Delete Channel 281C1 at La Grange, Georgia and allot Channel 281C1 to Greenville, Georgia.

Proposed Channel 239A Waverly Hall, Georgia

It is proposed to delete Channel 239C3 at Greenville, Georgia and allot Channel 239A to Waverly Hall, Georgia. The Waverly Hall proposal is mutually exclusive with the current Greenville allotment. There are no aural services assigned to Waverly Hall. It is herein proposed to reallocate Channel 281C1 from La Grange, Georgia to Greenville, Georgia. Therefore, Greenville would continue to have one assigned aural service.

The existing 70 dBu contour of Channel 239C3 at Greenville does not encompass any urbanized area. The proposed 70 dBu contour of Channel 239A at Waverly Hall, Georgia does not encompass any urbanized area. The town of Waverly Hall is not located within any urbanized area.

The attached Sheet 1 of Figure 2 is a tabulation of the required separations pertinent to the use of Channel 239A at Waverly Hall. The proposed reference site complies with the Commission's minimum distance separation requirements contained in Section 73.207 to all existing, authorized and proposed stations and allotments, except for Channel 239C3 at Greenville, Georgia, the subject of this proposed change. Operation from the reference site identified below will provide the requisite city grade signal to all of Waverly Hall. Sheet 2 of Figure 2 is a coverage map showing the 70 dBu contour and the city limits of Waverly Hall.

Below are the Channel 239A Waverly Hall reference site geographic coordinates:

32° 33' 58" North Latitude  
84° 41' 03" West Longitude



The town of Waverly Hall has a population of 709 persons.

The Channel 239A service gain area would contain 128,000 persons over an area of 1,100 square kilometers. The loss area would contain 86,400 persons over 3,400 square kilometers. The total Channel 239A 60 dBu service area would contain 157,000 persons over 2,460 square kilometers as compared to the existing Channel 239C3 60 dBu service area containing 115,500 persons over 4,780 square kilometers.

The other aural services that would serve the Channel 239C3 loss area are provided in Sheet 3 of Figure 2. All of the loss area would have 5 or more aural services remaining.

Proposed Channel 281C1 Greenville, Georgia

It is proposed to delete Channel 281C1 at La Grange and allot Channel 281C1 at Greenville, Georgia. This is required to continue to provide Greenville with an assigned aural service. La Grange would have continuing transmission service from WOAK(FM) on Channel 215A, WTRP(AM) on 620 kilohertz and WLAG(AM) on 1240 kilohertz. The Greenville proposal is mutually exclusive with the current La Grange allotment.

No change in site reference coordinates is proposed. Therefore, no loss or gain areas are created. The Channel 281C1 Greenville service area will maintain service to 2,485,000 persons over an area of 16,280 square kilometers. The reference site complies with the Commission's minimum distance separation requirements and operation from the site will encompass Greenville with the requisite 70 dBu contour.

The existing 70 dBu contour of Channel 281C1 at La Grange encompasses 1,000 square kilometers, or 20%, and 590,000 persons, or 17%, of the Atlanta urbanized area and population. Since there is no change in the Channel 281C1 allotment reference point, Channel 281C1 at Greenville will continue to maintain the same encompassment of the Atlanta Urbanized area. The city of Greenville is located outside of any urbanized area.

Below are the Channel 281C1 Greenville reference site geographic coordinates:

33° 24' 43" North Latitude  
84° 50' 03" West Longitude

The city of Greenville has a population of 946 persons.

Proposed Modifications to Table of Allotments

This proposal provides for the following allotment changes to Section 73.202, The Commission's Table of FM Allotments.

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Greenville, GA	239C3	281C1
La Grange, GA	281C1	----
Waverly Hall, GA	----	239A

Charles A. Cooper

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Avenue  
Sarasota, Florida 34237  
941.329.6000

April 10, 2003

TECHNICAL EXHIBIT  
PETITION FOR RULE MAKING

Summary of 60 dBu Service Gain/Loss Analysis

Allotment	Loss Area (km <sup>2</sup> )	Gain Area (km <sup>2</sup> )	Loss Population	Gain Population
Greenville, GA	3,400	----	86,400	----
Waverly Hall, GA	----	1,100	----	128,000
Total:	3,400	1,100	86,400	128,000

The proposal would have a "net" gain of 41,600 persons and a "net" loss of 2,300 square kilometers.

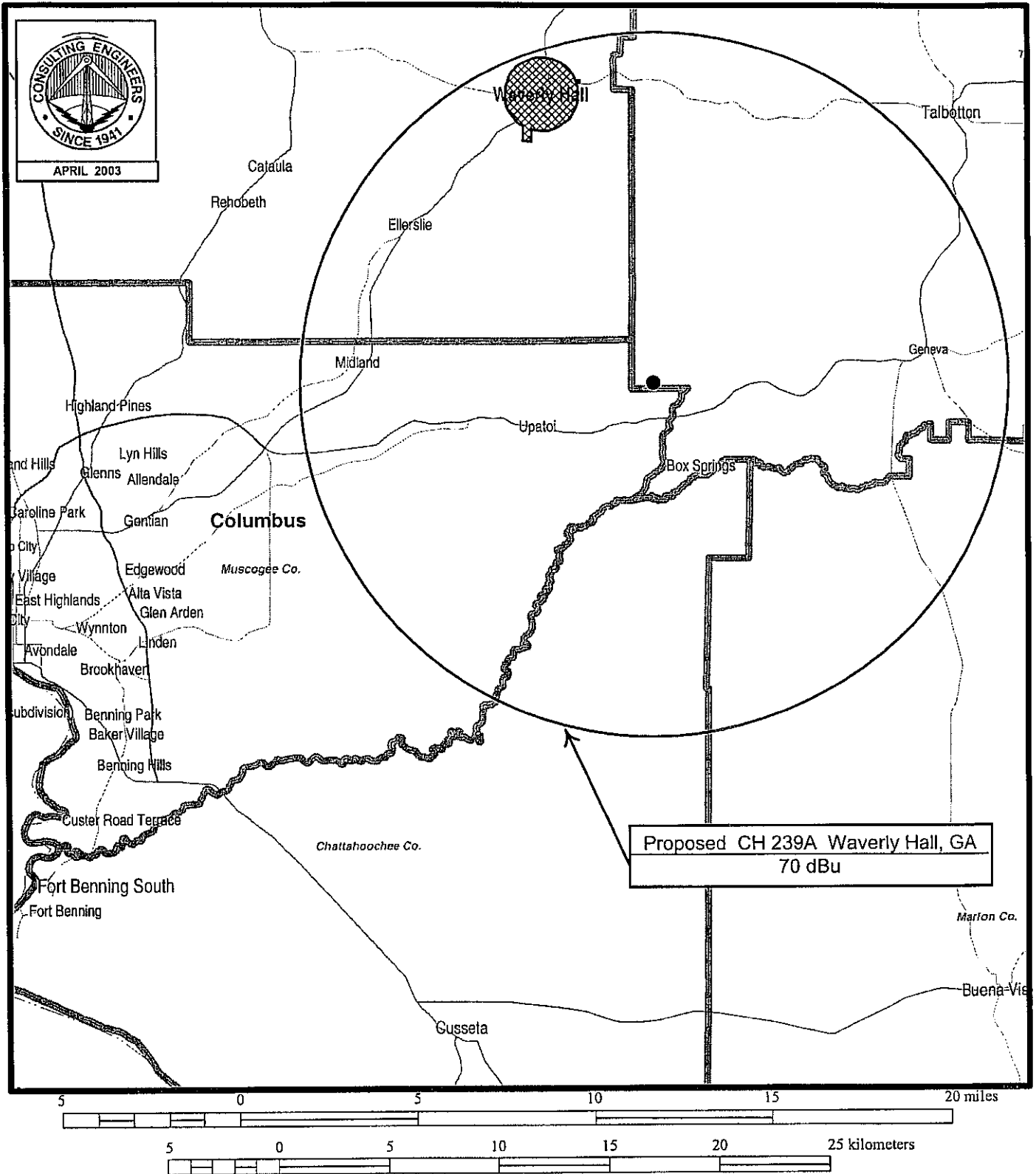
Note: Population based upon 2000 Census.

TECHNICAL EXHIBIT  
PETITION FOR RULE MAKING

Channel 239A Waverly Hall, Georgia Allocation Study

32° 33' 58" North Latitude  
84° 41' 03" West Longitude

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist. (km)	Req. (km)
WRLD-F 52040	VALLEY AL LIC C	BLH 20011119ABL	237C3 95.3	25 100	32-44-03 085-07-53	294.2	45.91	42.0
WTVY-F 73639	DOTHAN AL LIC C	BLH 19880323KD	238C0 95.5	100 323	31-15-16 085-15-39	200.6	155.33	152.0
WKZJ 50534	GREENVILLE GA LIC C	BLH 19950303KB	239C3 95.7	3.4 267	32-50-48 084-41-27	358.9	31.12	
<i>[Proposed to delete Channel 239C3 at Greenville. No allocation concern.]</i>								
WTGZ 48682	TUSKEGEE AL LIC C	BLH 19920803KD	240A 95.9	4.3 115	32-28-17 085-34-28	263.0	84.31	72.0

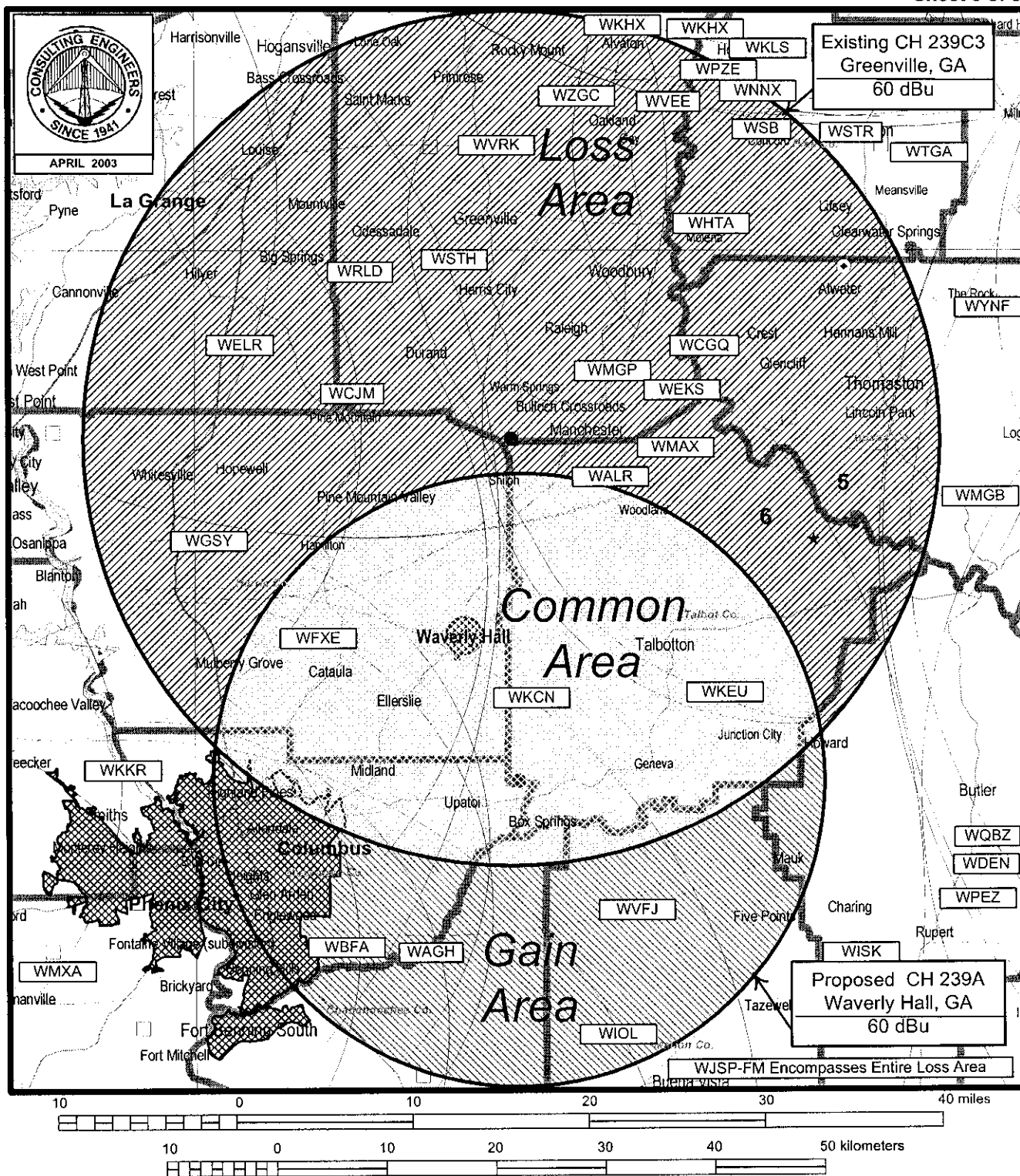


## **PROPOSED WAVERLY 70 dBu COVERAGE CONTOUR**

### **PETITION FOR RULE MAKING**

du Treil, Lundin & Rackley, Inc., Sarasota, Florida

Sheet 3 of 3



**PROPOSED WAVERLY HALL  
OTHER AURAL SERVICES IN LOSS AREA**

# PETITION FOR RULE MAKING

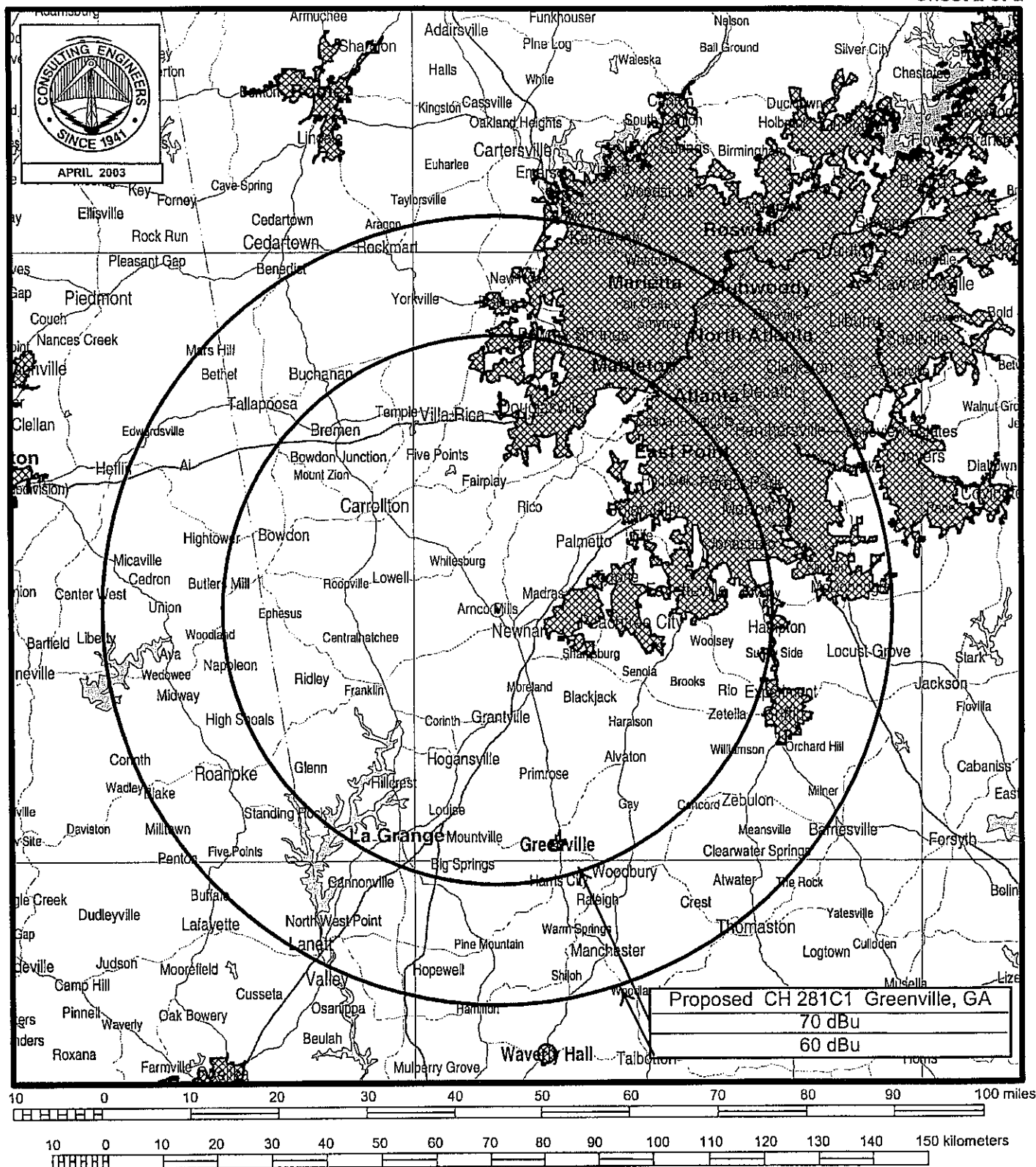
du Treil, Lundin & Rackley, Inc., Sarasota, Florida

TECHNICAL EXHIBIT  
PETITION FOR RULE MAKING

Channel 281C1 Greenville, Georgia

33° 24' 43" North Latitude  
84° 50' 03" West Longitude

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist. (km)	Req. (km)
WVFJ-F 53679	MANCHESTER GA	BLH LIC C 19980807KA	227C1 93.3	27 491	33-05-10 084-46-10	170.6	36.64	34.0
WDDK 6798	GREENSBORO GA	BLH LIC C 19981127KC	280A 03.9	5.3 100	33-28-29 083-14-46	86.9	147.83	133.0
WALR-F 48728	LA GRANGE GA	BLH LIC C 19860807KC	281C1 104.1	60 371	33-24-43 084-50-03	90.0	0.00	
<i>[Subject station of allocation modification. No allocation concern]</i>								
WRBN 56201	CLAYTON GA	BPH APP C 20020718ABU	281A 104.1	1.35 212.7	34-48-08 083-27-08	39.1	200.10	200.0
WCLE-F 55099	CALHOUN TN	BLH LIC C 19970129KC	281A 104.1	2.3 159	35-15-59 084-50-23	359.8	205.71	200.0
WRBN 56201	CLAYTON GA	BLH LIC C 19990401KA	281A 104.1	0.37 395	34-54-4 083-24-56	37.7	211.19	200.0
WKHC 34319	DAHLONEGA GA	BLH LIC C 19970106KC	282A 104.3	3.7 127	34-29-56 084-08-32	27.6	136.48	133.0
WQLD 6655	LUVERNE AL	BLH LIC C 19970731KB	282C1 104.3	13.5 558	31-58-28 086-09-44	218.2	202.29	177.0
WZYP 3083	ATHENS AL	BLH LIC C 19880510KB	282C 104.3	100 340	34-49-05 086-44-16	312.3	234.89	209.0
WFSH-F 56390	ATHENS GA	BPH APP C 20021106AAR	284C1 104.7	24 505	33-52-02 083-49-44	61.2	106.06	82.0



## PROPOSED GREENVILLE 70 dBu & 60 dBu COVERAGE CONTOURS

PETITION FOR RULE MAKING

du Treil, Lundin & Rackley, Inc., Sarasota, Florida